

# **2012 AHERA 3-Year Asbestos Re-inspection Report Management Plan Update**

**Jemez Day School  
P.O. Box 139  
243 Day School Road  
Jemez Pueblo, New Mexico**

**Submitted to:**

**Mr. Simon Nunez Jr.  
U.S. Department of the Interior  
Bureau of Indian Education  
New Mexico South  
1001 Indian School Road NW, Suite 149  
Albuquerque, New Mexico**

**September 7, 2012**

**Submitted by:**



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**Prepared by:**

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Rod L. Pawloski  
Program Manager

**Reviewed by:**

A handwritten signature in black ink, appearing to read "Joseph K. Palermo".

Joseph K. Palermo, LEED® AP  
Regional Manager

**Project No. 12P-A3077B**

**Summary of Findings  
2012 AHERA Re-inspection**

**Jemez Day School  
P.O. Box 139  
243 Day School Road  
Jemez Pueblo, New Mexico**

**CONTENTS:**

- 1. Comments - 2012 AHERA 3-Year Re-inspection of Bureau of Indian Education, New Mexico South – Jemez Day School**
- 2. Summary of Management Plan Changes**
- 3. EPA Re-inspection Form 2, Re-inspection of ACBM: Findings and Management Planner Recommendations**
- 4. Report of Limited Asbestos-Containing Material Survey**

**Comments:**

1. This Asbestos Hazard Emergency Response Action (AHERA) 3-Year Re-inspection was completed by relying on previous inspection reports completed in 2000, 2004, and 2009, as well as the 2009 Management Plan Update.
2. The only Asbestos Containing Building Material (ACBM) identified at the Site in the 2009 Management Plan Update included textured drywall walls in the Maintenance Building (Building 801).
3. Due to discrepancies in the sampling and the laboratory analysis findings detailed in the 2009 re-inspection report, the textured drywall walls were re-sampled and re-submitted for laboratory analysis. Point Count analysis of the textured drywall walls, using methods outlined in the AHERA 40 CFR 763, Subpart E, Appendix E, 1.7.2.4, *Quantitation of Asbestos Content*, determined that the previously determined ACBM contains a trace of asbestos confirmed by laboratory analysis at less than 1%.
4. Based on the laboratory results of the re-sampling, the textured drywall walls, previously determined as ACBM, will be removed from the Management Plan.
5. Recommendations provided in the Form 2 pages and the Summary of Management Plan Changes should be incorporated into the Asbestos Management Plan for this building.
6. There were no bulk samples of previously assumed or new suspect asbestos-containing materials collected as part of this re-inspection.

**SUMMARY OF ASBESTOS MANAGEMENT PLAN CHANGES**  
**AHERA Re-inspection**

**Jemez Day School**  
**P.O. Box 139**  
**243 Day School Road**  
**Jemez Pueblo, New Mexico**

As stated in 40 CFR 763.93(e)(10), the AHERA Management Plan shall include a description of steps taken to inform workers and building occupants, or their legal guardians, about inspections, re-inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.

A Limited Asbestos-Containing Material Survey conducted on July 16, 2012, and subsequent laboratory analysis of building material samples, found no ACBMs at the Jemez Day School.

The statement in the paragraph above may be reproduced for distribution to all workers, buildings occupants, and their legal guardians for the purposes of complying with the requirements of the AHERA Management Plan.



# **AHERA Re-inspection of ACBM: Findings and Management Planner Recommendations**

Page 01 of 01

**School:** Jemez Day School

**Building:** Building 801, Maintenance Building

**Address:** 243 Day School Road, Jemez Pueblo, New Mexico

**Date(s) of Re-inspection:** July 16, 2012

**Homogeneous Sampling Area:** Material Description Textured Drywall Walls

RE-INSPECTION FINDINGS FOR ACBM					MANAGEMENT PLANNER RECOMMENDATIONS		
Location(s) of ACBM by assessment category	Quantity	Friability (F or NF)	Assessment category (1-7, X)	Justification of assessment category	Change in assessment (Yes or No)	Preventive measures, Response actions, and Initial/additional cleanings	Schedule
Interior Walls throughout	1,500 square feet	NF	X	Non-ACBM	No	Material re-analyzed and shown to contain a trace of asbestos <1%. Remove this ACBM from the Management Plan.	Begin N/A
<p>Were additional samples of this ACBM collected? <b>Yes</b></p> <p>Inspector name: Joseph K. Palermo</p> <p>Inspector signature: <i>Joseph K. Palermo</i></p> <p>Accreditation #/State: F 4666/Arizona</p> <p>Expiration date: 5/4/2013</p>					<p>Date of management planner review: August 14, 2012</p> <p>Management planner name: Joseph K. Palermo</p> <p>Management planner signature: <i>Joseph K. Palermo</i></p> <p>Accreditation #/State: F 4688/Arizona</p> <p>Expiration date: 5/4/2013</p>		
I, the LEA's Designated Person, have read and understood the recommendations made above:						Date:	

## **Project Limitations**

This Project was performed using, as a minimum, practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by EH&S consultants performing similar services.

The procedures used attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time and other limitations, the conclusions should not be construed as a guarantee that all universal, toxic and/or hazardous wastes have been identified and fully evaluated. Furthermore, Keres-IHI assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of Keres-IHI or from omissions or errors in public records.

It is emphasized that the final decision on how much risk to accept always remains with the client since Keres-IHI is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.

**LIMITED ASBESTOS-CONTAINING MATERIAL SURVEY**

**Jemez Day School**

**P.O. Box 139  
243 Day School Road  
Jemez Pueblo, New Mexico**

**Submitted to:**

**Mr. Simon Nunez Jr.  
U.S. Department of the Interior  
Bureau of Indian Education  
New Mexico South  
1001 Indian School Road NW, Suite 149  
Albuquerque, New Mexico**

**September 7, 2012**

**Submitted by:**



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**Reviewed by:**

A handwritten signature in black ink, appearing to read "Joseph K. Palermo".

Joseph K. Palermo, LEED® AP  
Regional Manager

**Project No. 12P-A3077B**



## EXECUTIVE SUMMARY

As requested by the U.S. Department of Interior, Bureau of Indian Education (BIE), Keres Consulting (Keres) and IHI Environmental (IHI) recently conducted a limited asbestos survey of the Jemez Day School (JDS), located at 243 Day School Road in Jemez Pueblo, New Mexico (the Site). The survey was conducted by Keres-IHI personnel on July 16, 2012 and was limited to interior textured drywall walls in the Maintenance Building (Bldg. 801).

The Site consists of three (3) buildings including the Main School (Bldg. 800), Maintenance (Bldg. 801), and Portable Classroom. Based on previous asbestos inspection reports in 2000, 2004, and 2009 and the Asbestos Management Plan, the Maintenance building (Bldg. 801) was identified as the only building containing asbestos containing building materials (ACBMs).

Keres-IHI's sampling and visual survey were conducted by Mr. Joseph Palermo. Mr. Palermo is an Environmental Protection Agency (EPA)-certified Asbestos Hazard Emergency Response Act (AHERA) building inspector for asbestos. The inspection was conducted in general accordance with procedures as set forth in EPA regulations, 40 Code of Federal Regulation (CFR) 763, Subpart E of AHERA. EMLab P&K (EMLab) in San Bruno, California, performed the laboratory analysis of the suspect ACBM samples. During the limited survey, three (3) samples were collected from the site and analyzed for the presence of asbestos.

Based on the results of our survey, laboratory analysis showed trace amounts of asbestos less than one percent (<1%) by EPA 400 point count method. As a result, the textured drywall is not considered to be ACBM as defined by AHERA.

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations require the removal of friable ACBM and non-friable ACBM that could become friable during demolition activities. Despite EPA rules exempting building materials containing 1% or less asbestos from stringent regulation, OSHA regulations outline specific precautionary work practices when employees work with materials containing any detectable amount of asbestos. Compliance by building owners with the OSHA asbestos regulations may result in response actions not required by the EPA for certain unregulated materials.

## TABLE OF CONTENTS

Section	Title	Page No.
<b>EXECUTIVE SUMMARY</b>		
1.0	INTRODUCTION AND BACKGROUND.....	1
2.0	DESCRIPTION OF INSPECTED AREAS .....	1
3.0	SURVEY PROCEDURES AND LABORATORY ANALYSES.....	1
4.0	FINDINGS.....	3
5.0	PROJECT LIMITATIONS .....	4
<b>APPENDICES</b>		
A.	Personnel AHERA Certification	
B.	Laboratory Certification	
C.	EMLab Analytical Reports and Chain-of-Custody Documentation	
D.	Bulk Sample Location Map	



## LIMITED ASBESTOS-CONTAINING MATERIAL SURVEY

Jemez Day School  
P.O. Box 139  
243 Day School Road  
Jemez Pueblo, New Mexico

### 1.0 INTRODUCTION AND BACKGROUND

As requested by the U.S. Department of Interior, Bureau of Indian Education (BIE), Keres Consulting (Keres) and IHI Environmental (IHI) recently conducted a limited asbestos survey of the Jemez Day School (JDS), located at 243 Day School Road in Jemez Pueblo, New Mexico (the Site). The survey was conducted by Keres-IHI personnel on July 16, 2012 and was limited to interior textured drywall walls in the Maintenance Building (Bldg. 801).

In 2009, ACME Environmental, Inc. of Albuquerque, New Mexico (ACME), completed an asbestos inspection at the Site as documented in their report *AHERA Asbestos Survey at Jemez Day School*, dated December 3, 2009. This previous asbestos inspection determined that the only asbestos-containing building materials (ACBMs) at the Site consist of textured drywall walls in the Maintenance building. ACME collected three (3) textured drywall samples from interior textured drywall surfaces of the Maintenance Building (Bldg. 801). All of the samples showed asbestos detected and estimated between a trace amount and two percent (2%) by laboratory analysis.

### 2.0 DESCRIPTION OF INSPECTED AREAS

The Site consists of three (3) buildings including the Main School (Bldg. 800), Maintenance (Bldg. 801), and Portable Classroom. Based on previous asbestos inspection reports in 2000, 2004, and 2009 and the Asbestos Management Plan, the Maintenance building (Bldg. 801) was identified as the only building containing ACBMs. The Maintenance building is a single-story wood frame structure with a wood truss roof system, built on a concrete pad. This survey was limited to textured drywall walls in Building 801.

### 3.0 SURVEY PROCEDURES AND LABORATORY ANALYSES

Keres-IHI's sampling and visual survey were conducted by Mr. Joseph Palermo. Mr. Palermo is an Environmental Protection Agency (EPA)-certified Asbestos Hazard Emergency Response Act (AHERA) building inspector for asbestos. A copy of his current AHERA Building Inspector certificate is presented in Appendix A.

The limited inspection was conducted in general accordance with procedures as set forth in EPA regulations, 40 Code of Federal Regulation (CFR) 763, Subpart E of AHERA. EMLab P&K (EMLab) in San Bruno, California, performed the laboratory analysis of the suspect ACBM samples.

During the limited asbestos survey, each suspect ACBM was designated as a distinct homogeneous area, which is generally defined as a single material, uniform in texture and appearance, installed at one time, and unlikely to consist of more than one type or formulation of material. As part of our assessment, the inspector physically touched each suspect material to determine friability.

A sufficient number of samples were collected of each material to satisfy the Occupational Safety and Health Administration (OSHA) and National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for the determination of asbestos content. During the limited survey, three (3) samples were collected from the site and analyzed for the presence of asbestos.

As part of our survey, each sample was assigned a unique sample identification number. Each homogeneous area was also visually and physically assessed for material condition and assigned a NESHAP category if determined to be ACBM by laboratory analysis, as shown in Table 1.

The samples were delivered to EMLab for analysis using standard chain-of-custody protocol. Once received, the samples were analyzed by Polarized Light Microscopy (PLM) analysis, using EPA Method 600/R-93/116 (EPA-600/M4-82-020 (SOP01267)). Samples showing asbestos content less than 10% were re-analyzed by EPA 400 point count using EPA Method EPA-600/M4-82-020 (SOP01267).

EMLab is accredited by the National Institute for Science and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk-asbestos sample analysis administered by the NIST. A copy of the EMLab NVLAP certification (Accreditation No. 200728-0) is presented in Appendix B.



#### 4.0 FINDINGS

The analytical results of Keres-IHI's asbestos survey are presented in Table 1 below. The EMLab report, along with chain-of-custody documentation, is presented in Appendix C. A bulk sample location map is presented in Appendix D.

**TABLE 1: Limited Asbestos Survey Results – Jemez Day School (Bldg. 801)  
243 Day School Road, Jemez Pueblo, New Mexico (July 16, 2012)**

Sample Number	Material	Sample Location	Category/ Friability	ACBM	Condition
JEMEZ-DRY-01	Non-fibrous paint Joint Compound Drywall	West entry	S/NF	<1% Chrysotile <1% Chrysotile None Detected	Good
JEMEZ-DRY-02	Non-fibrous paint Joint Compound Drywall	Janitor closet, Northwest corner	S/NF	<1% Chrysotile <1% Chrysotile None Detected	Good
JEMEZ-DRY-03	Joint compound Drywall	Shop room, Northwest corner	S/NF	<1% Chrysotile None Detected	Good
<b>Notes:</b> 1. Category (M = Miscellaneous; S = Surfacing; TSI = Thermal System Insulation) 2. Friability (F = Friable; NF = Non-friable) 3. <1% Chrysotile determined by EPA 400 Point Count EPA Method EPA-600/M4-82-020 4. A total of 1,500 square feet of textured drywall walls was estimated in Bldg. 801.					

Based on the results of our survey, laboratory analysis showed trace amounts of asbestos less than one percent (<1%) by EPA 400 point count method. As a result, the textured drywall is not considered to be ACBM as defined by AHERA.

The EPA NESHAP and AHERA regulations define ACBM as material containing greater than 1% asbestos by weight. Materials containing 1% or less asbestos are not considered regulated ACBM by the EPA. Further, the NESHAP regulations state that any sample of friable material found to contain less than 10% asbestos but greater than "none detected," by the visual estimation method used during PLM analysis, must be assumed to contain greater than 1% asbestos unless confirmed by point counting analysis. Although the previous ACME report determined that two (2) samples of the textured drywall at the Site contained 2% asbestos by visual estimation, the samples were not point counted and therefore were not clearly determined to be ACBM.

NESHAP regulations require the removal of friable ACBM and non-friable ACBM that could become friable during demolition activities. Despite EPA rules exempting building materials



containing 1% or less asbestos from stringent regulation, OSHA regulations outline specific precautionary work practices when employees work with materials containing any detectable amount of asbestos. Compliance by building owners with the OSHA asbestos regulations may result in response actions not required by the EPA for certain unregulated materials.

Under the OSHA Construction Standard for Asbestos (29 CFR 1926.1101), drywall containing less than or equal to 1% asbestos is still regulated to some degree. The employer who disturbs this asbestos material must, 1) use wet methods, 2) promptly contain any waste in leak-tight containers, and 3) conduct air monitoring or have a negative exposure assessment. The waste is not regulated for transportation or disposal by EPA or OSHA.

## **5.0 PROJECT LIMITATIONS**

This Project was performed using, as a minimum, practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by industrial hygiene and environmental consultants performing similar services.

The procedures used in this investigation attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time, and other limitations, the conclusions should not be construed as a guarantee that all environmental or occupational hazards have been identified and fully evaluated. Where sample collection and testing have been performed, Keres-IHI's professional opinions are based in part on the interpretation of data from discrete sampling locations that may not represent conditions at non-sampled locations.

Keres-IHI assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of Keres-IHI or from omissions or errors in public records. Furthermore, it is emphasized that the final decision on how much risk to accept always remains with the client since Keres-IHI is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.

**APPENDIX A**

**IHI Personnel AHERA Certification**



# THE ASBESTOS INSTITUTE

Certifies that

**Joseph K Palermo**

has attended the EPA approved course

**AHERA Building Inspector Refresher**

**Approval Code: CA-089-06**

**May 4, 2012**

and successfully passed the competency exam.

Date of Examination: **May 4, 2012**

Date of Expiration: **May 4, 2013**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE

20033 N. 19th Avenue

Building #6

Phoenix, AZ 85027

602-864-6564



# THE ASBESTOS INSTITUTE

Certifies that

**Joseph K Palermo**

has attended the EPA approved course

**AHERA Management Planner Refresher**

**Approval Code: CA-089-08**

**May 4, 2012**

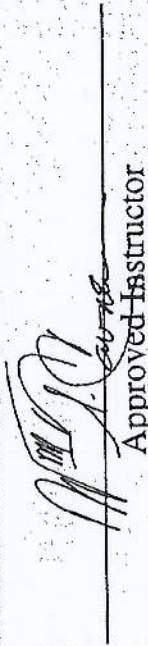
and successfully passed the competency exam.

Date of Examination: **May 4, 2012**

Date of Expiration: **May 4, 2013**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE

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Phoenix, AZ 85027

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# THE ASBESTOS INSTITUTE

Certifies that

**Rod L Pawloski**

has attended the EPA approved course

**AHERA Refresher  
Building Inspector  
December 2, 2011**

and successfully passed the competency exam.

Date of Examination: **December 2, 2011**

Date of Expiration: **December 2, 2012**



William T. Cavness  
Director



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# THE ASBESTOS INSTITUTE

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**AHERA Refresher  
Management Planner  
December 2, 2011**

and successfully passed the competency exam.

Date of Examination: **December 2, 2011**

Date of Expiration: **December 2, 2012**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE

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Phoenix, AZ 85021-4962

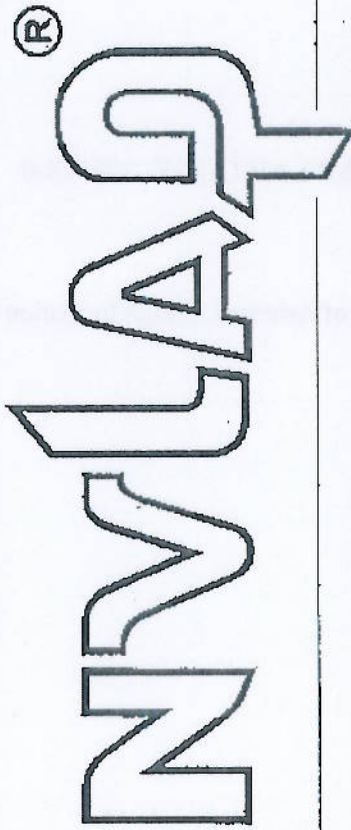
602-864-6564



APPENDIX B

Laboratory Certification

United States Department of Commerce  
National Institute of Standards and Technology



## Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 200728-0

**EMLab P&K, LLC**  
San Bruno, CA

is accredited by the National Voluntary Laboratory Accreditation Program for specific services,  
listed on the Scope of Accreditation, for:

### **BULK ASBESTOS FIBER ANALYSIS**

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.  
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2012-07-01 through 2013-06-30

Effective dates



A handwritten signature in dark ink, appearing to read "William D. Mudd".

For the National Institute of Standards and Technology



**National Voluntary  
Laboratory Accreditation Program**



**SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005**

**EMLab P&K, LLC**  
1150 Bayhill Drive  
Suite 100  
San Bruno, CA 94066  
Mr Tim Costello  
Phone: 650-228-6938 Fax: 650-742-8162  
E-Mail: [tcostello@emlabpk.com](mailto:tcostello@emlabpk.com)  
URL: <http://www.emlabpk.com>

**BULK ASBESTOS FIBER ANALYSIS (PLM)**

**NVLAP LAB CODE 200728-0**

***NVLAP Code      Designation / Description***

18/A01	EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
--------	--

2012-07-01 through 2013-06-30

*Effective dates*

*For the National Institute of Standards and Technology*



## APPENDIX C

### EMLab Analytical Reports and Chain-of-Custody Documentation



Report for:

**Mr. Joe Palermo**  
**IHI Environmental, Phoenix**  
4527 N. 16th Street  
Suite 105  
Phoenix, AZ 85016

Regarding:      Project: 12P-A3077; Keres-BIE NM  
EML ID: 947289

Approved by:

Dates of Analysis:  
Asbestos-EPA Method 600/R-93/116: 07-24-2012

Technical Manager  
Miguel Ines

Service SOPs: Asbestos-EPA Method 600/R-93/116 (EPA-600/M4-82-020 (SOP 01267))

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data can be provided when requested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Document Number: 200091 - Revision Number: 5

EMLab P&K, LLC

EMLab ID: 947289, Page 1 of 4



**EMLab P&K**

3585 Cadillac Ave, Suite A, Costa Mesa, CA 92626  
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: IHI Environmental, Phoenix  
C/O: Mr. Joe Palermo  
Re: 12P-A3077; Keres-BIE NM

Date of Sampling: 07-16-2012  
Date of Receipt: 07-19-2012  
Date of Report: 07-24-2012

**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**

**Total Samples Submitted:** 9

**Total Samples Analysed:** 9

**Total Samples with Layer Asbestos Content > 1%:** 0

**Location: Jemez-DRY-01, Textured drywall**

Lab ID-Version†: 4221634-1

Sample Layers	Asbestos Content
White Non-Fibrous Material With Paint	< 1% Chrysotile
White Joint Compound	< 1% Chrysotile
White Drywall	ND
<b>Composite Asbestos Fibrous Content:</b>	< 1% Asbestos
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b> Good	

**Comments:** Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

**Location: Jemez-DRY-02, Textured drywall**

Lab ID-Version†: 4221635-1

Sample Layers	Asbestos Content
White Non-Fibrous Material With Paint	< 1% Chrysotile
White Joint Compound	< 1% Chrysotile
White Drywall	ND
<b>Composite Asbestos Fibrous Content:</b>	< 1% Asbestos
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b> Good	

**Comments:** Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

**Location: Jemez-DRY-03, Textured drywall**

Lab ID-Version†: 4221636-1

Sample Layers	Asbestos Content
White Joint Compound	< 1% Chrysotile
White Drywall	ND
<b>Composite Asbestos Fibrous Content:</b>	< 1% Asbestos
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b> Good	

**Comments:** Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

† A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".



# EMLab P&K

A TestAmerica Company

Report for:

**Mr. Joe Palermo**  
**IHI Environmental, Phoenix**  
4527 N. 16th Street  
Suite 105  
Phoenix, AZ 85016

Regarding: Project: 12P-A3077; Keres-BIE NM  
EML ID: 947289

Approved by:

Dates of Analysis:  
Asbestos-EPA 400 point count: 07-30-2012

*Miguel Constantino Ines*

Technical Manager  
Miguel Ines

Service SOPs: Asbestos-EPA 400 point count (EPA-600/M4-82-020 (SOP 01262))

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the items tested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Document Number: 200091 - Revision Number: 5

EMLab P&K, LLC

EMLab ID: 947289, Page 1 of 3



Client: IHI Environmental, Phoenix  
C/O: Mr. Joe Palermo  
Re: 12P-A3077; Keres-BIE NM

Date of Sampling: 07-16-2012  
Date of Receipt: 07-19-2012  
Date of Report: 07-30-2012

**ASBESTOS POINT COUNT REPORT: EPA METHOD 600/R-93-116**

Location:	Jemez-DRY-01 Textured drywall		
Total Points Counted:	400		
Lab ID-Version‡:	4228422-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA
White Non-Fibrous Material With Paint	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA

**Comments:** Asbestos was detected, but no points counted.

Location:	Jemez-DRY-02 Textured drywall		
Total Points Counted:	400		
Lab ID-Version‡:	4228423-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA
White Non-Fibrous Material With Paint	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA

**Comments:** Asbestos was detected, but no points counted.

Location:	Jemez-DRY-03 Textured drywall		
Total Points Counted:	400		
Lab ID-Version‡:	4228424-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA

**Comments:** Asbestos was detected, but no points counted.

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".



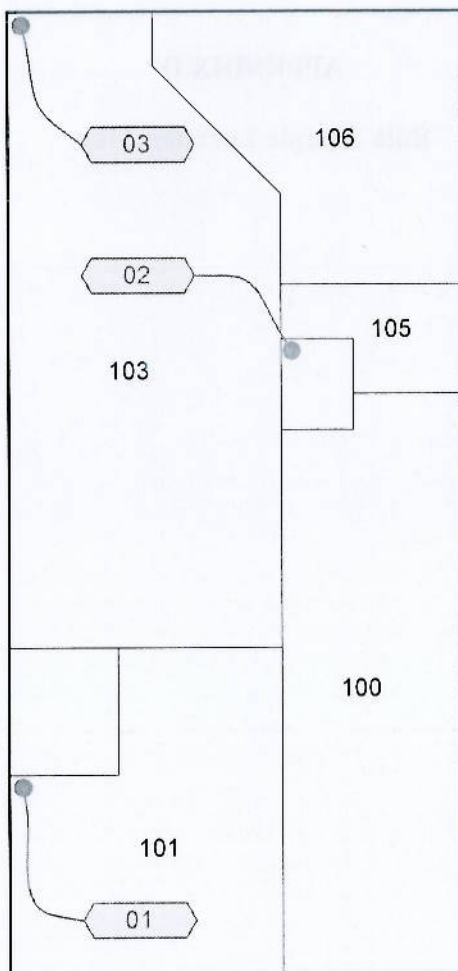




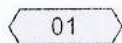
### Bulk Sample Location Map

### Bulk Sample Location Map

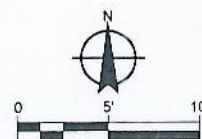
V:\OuterOfficeCAD\Phoenix\0201212P-A307712PA3077.dwg, bldg 801 sam loc. 8/29/2012 2:24:37 PM, Keith, ANSI full bleed A (8.50 x 11.00 inches)



Explanation



Asbestos Sample Number & Locations



**IHI**  
ENVIRONMENTAL  
4527 North 16th St. #105  
Phoenix, AZ 85016  
602.775.0300  
phoenix@ihi-env.com

Keres - BIE  
Jemez Day School Building 801  
Phoenix, Arizona

**Asbestos Sample Location Map**

PROJECT No:	12P-A3077
SHEET NO:	1 of 1
DRAWN BY:	Keith
DATE:	08-29-2012
REVIEWED BY:	
DATE:	